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Moonbug Entertainment Limited and
Treasure Studio, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MOONBUG ENTERTAINMENT
LIMITED and TREASURE STUDIO, INC.,

Plaintiffs,

v.

BABYBUS CO., LTD and BABYBUS
(FUJIAN) NETWORK TECHNOLOGY
CO., LTD,





Defendants.

Case No: 3:21-cv-06536-EMC

**EXHIBIT G TO THE DECLARATION
OF FRAN KRAUSE IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT OF
NONINFRINGEMENT**

FILED UNDER SEAL








EXHIBIT G – Substantial Similarity in Super JoJo’s “Swimming Song”




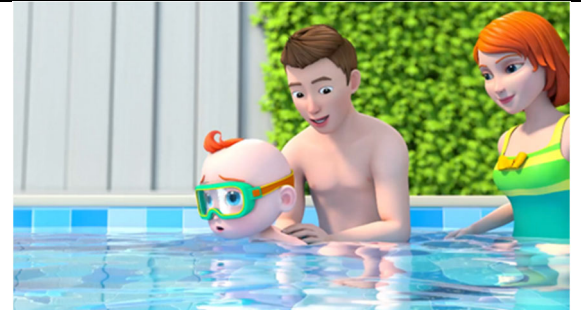


Images/Text in Super JoJo Planning Document BB_00001008 ¹	Original Images in CoComelon “Swimming Song” (MB037898) ²	Substantially Similar Material in Super JoJo “Swimming Song” (BB_00012966) ³
<ul style="list-style-type: none"> Everyone starts jumping into the pool, but the baby suddenly gets cold feet and doesn't jump. <p>Text from BB_00001012.</p>	 <p>So let's jump in the water, it's nice and cool</p> <p>Image from CoComelon “Swimming Song” (MB037898) at 0:29, JJ nervously looks into the pool, shown with an upward camera angle and distorted by the water.</p>	 <p>Image from BB_00012966 at 0:16, JoJo nervously looks into the pool, shown with an upward camera angle and distorted by the water.</p>
<ul style="list-style-type: none"> Mother, father, brother and sister encourages the baby to go into the water so the baby starts to try, tapping the water with his feet and paddling, laughing <p>Text from BB_00001012.</p>	 <p>So let's jump in the water, it's nice and cool</p> <p>Image from MB037898 at 0:32, JJ's family, already in the pool, beckon him to join them.</p>	 <p>Image from BB_00012966 at 0:21, JoJo's family, already in the pool, beckon him to join them.</p>



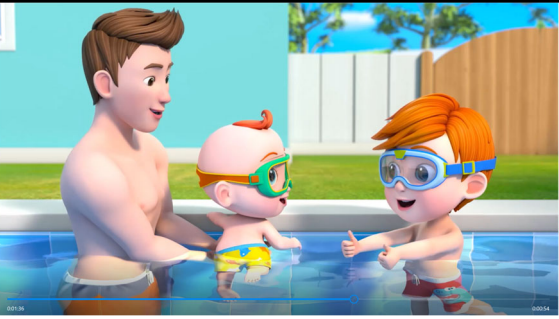




¹ I am informed that BB_00001008 and its certified translation are provided as Exhibit E to the Hedley Declaration, filed commensurately.

² CoComelon Works cited in this document: Dkt. No. 165 (all of the following are exhibits to Apple Declaration manually filed at Dkt. No. 165), Ex. 033 - MB037898 (Swimming Song).

³ Super JoJo Infringing Works cited in this document: Dkt. No. 165, Ex. 159 - BB_00012966 (Swimming Song), *see also* Dkt. 180-3, Ex. T-4.

Images/Text in Super JoJo Planning Document BB_00001008 ¹	Original Images in CoComelon "Swimming Song" (MB037898) ²	Substantially Similar Material in Super JoJo "Swimming Song" (BB_00012966) ³
 <p>Video reference (0:34-0:37): https://bit.ly/2lqXy4n Image / text from BB_00001012-13.</p>	 <p>Image from MB037898 at 0:36, JJ cautiously dips his right foot in the pool.</p>	 <p>Image from BB_00012966 at 0:24, JoJo cautiously dips his right foot in the pool.</p>
<p>The baby asks the mother to carry him into the water.</p> <p>Text from BB_00001013.</p>	 <p>Image from MB037898 at 0:44 – JJ's mom places him in the pool.</p>	 <p>Image from BB_00012966 at 0:29 – JoJo's mom places him in the pool.</p>
	 <p>Image from MB037898 at 1:02 – JJ, held by his father, a sibling is in the pool on their back.</p>	 <p>Image from BB_00012966 at 1:38 – JoJo, held by his father, a sibling is in the pool on their back.</p>

Images/Text in Super JoJo Planning Document BB_00001008 ¹	Original Images in CoComelon "Swimming Song" (MB037898) ²	Substantially Similar Material in Super JoJo "Swimming Song" (BB_00012966) ³
<p>After playing water, brother and sister show off their swimming skills (backstroke, freestyle). The baby envies them.</p> <p>Text from BB_00001013.</p>	 <p>I Jump in the water, we're going for a swim</p> <p>Image from MB037898 at 1:46 – JJ's brother and sister race each other in the pool.</p>	 <p>Image from BB_00012966 at 2:06 – JoJo's brother and sister race each other in the pool.</p>
<p>After playing water, brother and sister show off their swimming skills (backstroke, freestyle). The baby envies them.</p> <p>Text from BB_00001013.</p>	 <p>It's a hot sunny day, so come on, let's all get in</p> <p>Image from MB037898 at 1:50 – JJ sees his brother and sister swim and wants to do the same.</p>	 <p>Image from BB_00012966 at 2:07 – JoJo sees his brother and sister swim and wants to do the same.</p>
<ul style="list-style-type: none"> The father carries the baby to the pool edge, and the brother swims to set an example <p>Text from BB_00001014.</p>	 <p>Kick my legs do do do do do do</p> <p>Image from MB037898 at 2:11 – JJ's brother holds onto the edge of the pool and demonstrates kicking.</p>	 <p>Image from BB_00012966 at 1:20 – JoJo's brother holds onto the edge of the pool and demonstrates kicking.</p>

<p>Images/Text in Super JoJo Planning Document BB_00001008¹</p>	<p>Original Images in CoComelon "Swimming Song" (MB037898)²</p>	<p>Substantially Similar Material in Super JoJo "Swimming Song" (BB_00012966)³</p>
<p>(Caution to slow the movement, not too fast) Video reference (2:05-2:19): https://bit.ly/2laMi7X</p>  <p>Image / text from BB_00001014.</p>	 <p>Image from CoComelon "Swimming Song" (MB037898) at 2:12.</p>	 <p>Images from BB_00012966 at 1:36.</p>
<p>Father is holding the baby to practice swimming, and the brother helps the baby to kick water. The baby follows their lead. Everyone encourages him.</p> <p>Text from BB_00001014.</p>	 <p>Image from MB037898 at 2:15 – JJ's father laughs and holds him while he practices holding the edge of the pool and kicking, getting a "thumbs up" from his brother.</p>	 <p>Images from BB_00012966 at 1:36 – JoJo's father laughs and holds him while he practices holding the edge of the pool and kicking, getting a "thumbs up" from his brother.</p>
<p>Father is holding the baby to practice swimming, and the sister helps the baby stroke water. The baby follows their lead. Everyone encourages him.</p> <p>Text from BB_00001015.</p>	 <p>Image from MB037898 at 2:18 – JJ's father holds him while he practices using his arms to swim.</p>	 <p>Images from BB_00012966 at 1:50 – JoJo's father holds him while he practices using his arms to swim.</p>

Images/Text in Super JoJo Planning
Document BB_00001008¹



Image from BB_00001016.

Towards the end, the scene becomes a photo on the wall of the house (need to show a photo with the whole family playing in the water).

Text from BB_00001016.

Original Images in CoComelon
“Swimming Song” (MB037898)²

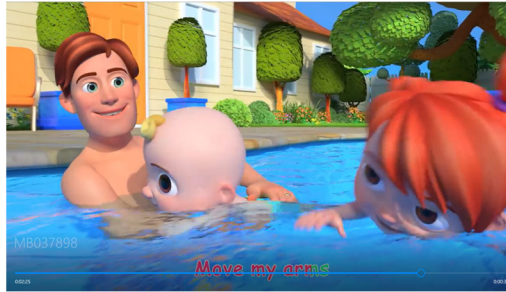
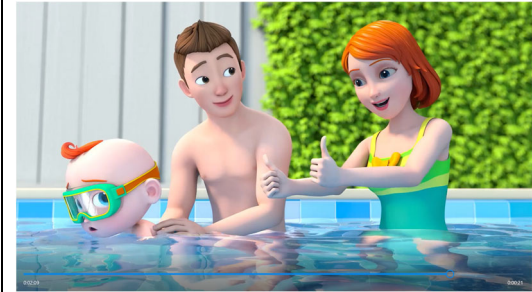


Image from CoComelon “Swimming Song”
(MB037898) at 2:25.



Image from MB037898 at 2:33 – the entire
family floats on their backs.

Substantially Similar Material in Super JoJo
“Swimming Song” (BB_00012966)³



Images from BB_00012966 at 2:10.



Images from BB_00012966 at 2:26 – the
entire family floats on their backs.